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August 19, 1998

VIA HAND DELIVERY

Magalie Roman Salas, Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554

RE: Americatel's Petition for Waiver
CC Docket No. 92-237

Dear Ms. Roman Salas:

Enclosed for filing, in the above-captioned proceeding, please find an original and four (4) copies of the "Comments of Americatel Corporation" on MCI's "Petition for Emergency Stay," filed in the above-referenced docket on August 12, 1998.

Please return the "stamp and return copy" to the messenger for delivery back to our office.

If you have any questions regarding this submission, please call the undersigned at (202) 414-9481.

Sincerely,


Brenda K. Pennington

Enclosure

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CC Docket No. 92-237

COMMENTS OF AMERICATEL CORPORATION

I. INTRODUCTION

Americatel Corporation ("Americatel"), by and through its undersigned counsel, hereby submits its comments in support of MCI Telecommunications Corporation's ("MCI") "Petition for Emergency Stay" ("Petition"), filed August 12, 1998, requesting a stay of the September 1, 1998 phase-out deadline of the blocking of three-digit carrier identification codes ("CIC") as ordered by the Federal Communications Commission in this docket.¹

II. COMMENTS

In its Petition, MCI states, *inter alia*, that when a five-digit carrier access code ("CAC") is transported to an end office already converted to accept four-digit CICs, many end

1 *Administration of the North American Numbering Plan Carrier
Identification Codes*, Declaratory Ruling, CC Docket No. 92-
237 (rel. May 1, 1998) ("Declaratory Ruling").

users do not immediately receive the appropriate intercept announcements. Instead, after a prolonged period of excessive ringing, the calls are routed by the local exchange carriers ("LECs") to a delayed announcement, resulting in incompleting calls.² According to MCI's field tests, this problem occurs most frequently in the Bell Atlantic territory.³ However, as correctly pointed out by MCI, this technical deficiency threatens the integrity of all dial-around interexchange services in all major LEC territories.⁴

Americatel, majority owned and controlled by Entel International BVI Corp., a wholly-owned subsidiary of Empresa Nacional de Telecomunicaciones S.A. ("Entel"), on March 27, 1998, launched the first casual dial-around service focused specifically on the growing Hispanic population in the U.S. At present, Americatel markets to more than 4 million Hispanics in seven states.⁵

Being a dial-around company, Americatel is very concerned about the integrity of the telephone network,

² *Administration of the North American Numbering Plan Carrier Identification Codes*, CC Docket No. 92-237, MCI Petition for Emergency Stay ("Petition"), filed August 12, 1998, at 1.

³ *Id.* at 5.

⁴ *Id.* at 1.

⁵ Currently Americatel provides service in South Florida, the Greater Chicago area, New Mexico, most of Arizona, and parts of Colorado, Indiana, and Wisconsin.

particularly matters related to dial-around service integrity. Americatele is concerned that excessive ringing before reaching an intercept announcement may lead to an overall negative perception regarding the quality of service provided by dial-around companies. This phenomenon, if gone uncorrected, will negatively affect dial-around companies' ability to increase market share and remain competitive, particularly as there is already a great risk of customer confusion about dial-around services stemming from the current transition to seven-digit CACs.

III. CONCLUSION

WHEREFORE, for all of the foregoing reasons, Americatele respectfully requests that MCI's "Petition for Emergency Stay" of the September 1, 1998 phase-out deadline for blocking of three-digit CICs be granted.

Respectfully Submitted,

AMERICATELE CORPORATION

By: 

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August 19, 1998

CERTIFICATE OF SERVICE

I, Brenda K. Pennington, hereby certify that on this 19th day of August 1998, copies of the foregoing "Comments of Americatel Corporation" were hand-delivered to the following parties.


Brenda K. Pennington

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